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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

HASHEEM BOUDJERADA; DAMON  
COCHRAN-SALINAS; ERIN GRADY;  
TYLER HENDRY; and KIRTIS  
RANESBOTTOM,

Plaintiffs,

Case No. 6:20-cv-1265-MK

DECLARATION OF KIRTIS  
RANESBOTTOM

v.

CITY OF EUGENE; SARAH MEDARY;  
WILLIAM SOLESBEE; SAMUEL STOTTS;  
BO RANKIN; TRAVIS PALKI; MICHAEL  
CASEY; ANTHONY VIOTTO; and RYAN  
UNDERWOOD,

Defendants.

1. I am one of the plaintiffs in this case. I make the statements in this declaration based upon my personal knowledge. I am competent to testify to the matters stated herein.

2. On May 31, 2020, I was residing at the Campbell Club, 1670 Alder Street, Eugene, Oregon.

3. That day, I received messages stating that there were white nationalists targeting people of color in the protests downtown.

4. Alarmed for the safety of my friends and other protesters of color, I and a group

of my housemates drove downtown to the protest.

5. We arrived at Alton Baker Park, and saw a group of protesters leaving the larger protest. This group, who were all strangers to me, invited me and my housemates to continue the protest by moving to the library and Lane Transit District bus station. We followed the protest.

6. We were across the street from the Lane Transit District bus station and library some time before 9:00 pm, when the police announced on a megaphone that a curfew would be taking effect later that evening. They also said that our protest was an unlawful assembly and that we had to move.

7. Once the police declared an unlawful assembly, I and the rest of the protesters moved down the sidewalk towards Willamette Street. The only people I saw in the roadway were the police.

8. As we were moving on the sidewalk, I saw the police fire projectiles at people at point-blank range. They fired teargas directly at people, not aiming towards the ground. One officer fired teargas directly at me, but I jumped out of the way. At that point I went home.

9. I took Willamette most of the way back home, then turned right on Alder.

10. I arrived home before the citywide curfew (which I later learned about) started. I went upstairs to my room.

11. Later I heard police shooting dozens of projectiles outside the Campbell Club — pepperballs, teargas, and at least two hard plastic rounds. That was the first point that I knew there were police outside the Campbell Club.

12. From inside the house, I saw police parked in front of the house with their sirens on.

13. I saw that there were other protesters outside the Campbell Club, and I saw police

driving after them and heard the police fire more projectiles at them.

14. I went downstairs. As I was coming down the stairs, I saw my roommate Damon Cochran-Salinas opening the front door to let Eric Howanietz into the house, and closing the door as police were still firing towards Eric. After Damon shut the door, I heard rounds hitting the door. In the front hallway, Eric showed me a nasty bruise where he had just been hit with one of the hard plastic rounds.

15. My roommates and I sat in the living room, keeping watch of what the police were doing outside the house.

16. I saw the police continue to sit in front of the Campbell Club for five to ten minutes before moving on. I remained in the house for the rest of the night.

17. I saw windows damaged on the front of the Campbell Club that were not damaged previous to the night of May 31. I believe their damage was caused by pepperballs fired by police, partially because there was powder residue around the areas of impact on the windows that would be consistent with the contents of a pepperball.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 30<sup>th</sup> day of September, 2022, at Eugene, Oregon.



KIRTIS RANESBOTTOM